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11
                      UNITED STATES DISTRICT COURT
12
                 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13
   UNITED STATES OF AMERICA,   No. 2:25-mj-03506-DUTY
14
              Plaintiff,   MOTION TO DISMISS COMPLAINT
15   WITHOUT PREJUDICE AGAINST
              v.   DEFENDANTS PURSUANT TO FEDERAL
16   RULE OF CRIMINAL PROCEDURE 48(a)
   ASHLEY RODRIGUEZ, and
17 JOCELINE RODRIGUEZ,

18   Defendants.

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21   The United States Attorney for the Central District of

22 California hereby requests leave of the Court to dismiss the

23 complaint against defendants Ashley Rodriguez and Joceline Rodriguez

24 without prejudice.

25   The government's request for dismissal is made in good faith

26 and in the interest of justice. The law "generally require[s] a

27 district court to defer to the government's decision to seek a

28 dismissal of a criminal charge" under Rule 48(a) motions when they

                                1

1 are not opposed by the defense. United States v. Gonzalez, 58 F.3d

2 459, 462 (9th Cir. 1995).

3   Accordingly, the government requests that the Court grant this

4 motion to dismiss the complaint without prejudice against defendants

5 Ashley Rodriguez and Joceline Rodriguez pursuant to Federal Rule of

6 Criminal Procedure 48(a).

7 Dated: June 23, 2025   Respectfully submitted,

8   BILAL A. ESSAYLI
                                    United States Attorney
9
                                    CHRISTINA T. SHAY
10   Assistant United States Attorney
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12   _____/s/_____
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